

**IN THE UNITED STATES BANKRUPTCY COURT
District of Massachusetts**

In the Matter of:	}	
	}	Case No. 18-10180- FJB
Chandra N. Joseph-Lacet,	}	
	}	Chapter 13
	}	
Debtor	}	

DEBTOR’S MOTION TO VACATE DISMISSAL

Debtor, by counsel, respectfully moves this Honorable Court to vacate its Order of Dismissal dated March 7, 2018 and states the following in support thereof:

1. Debtor commenced this case on January 19, 2018 by filing a voluntary petition for relief under Chapter 13 of Title 11 of the United States Bankruptcy Code.
2. In the Chapter 13 Plan, the name of a secured creditor was erroneously listed as Mr. Cooper instead of Northstar Mortgage, LLC, dba Mr. Cooper.
3. On February 15, 2018 this Court issued an Order to serve the plan on Mr. Cooper, amend Schedule D to include Mr. Cooper as a creditor and take other actions relating to the listing of Mr. Cooper as a secured creditor within the Chapter 13 Plan.
4. On February 15, 2018 the Debtor filed her response to the Court’s order, explaining the relationship between Northstar Mortgage, LLC and Mr. Cooper and stating her intent to file an amended plan.
5. On February 16, 2018, this Court thereupon vacated its order, declared the original plan moot and further ordered the Debtor to file an amended plan and motion to approve on or before March 5, 2018.
6. Debtor’s counsel neglected to diary the deadline for filing the amended plan and motion to approve, resulting in those documents not being filed per the Court’s order.
7. Debtor has this date filed her Amended Plan and Motion to Approve same, attached hereto.

WHEREFORE, the Debtor respectfully requests that this Court vacate its March 7, 2018 Order dismissing her case.

Respectfully submitted,
The Debtor,

By her attorney,

/s/ Richard C. Hyman
Richard C. Hyman, Esq.
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Dated: March 7, 2018

CERTIFICATE OF SERVICE

I, Richard C. Hyman, Esquire, state that on April 15, 2016 a copy of the DEBTOR'S MOTION TO VACATE ORDER OF DISMISSAL was electronically filed with the United States Bankruptcy Court for the District of Massachusetts using the CM/ECF System. I served the foregoing document on the following CM/ECF participants:

John Fitzgerald, US Trustee
United States Department of Justice
5 Post Office Square, Suite 1000
Boston, MA 02109-3934

Carolyn Bankowski, Chapter 13 Trustee
P.O. Box 8250
Boston, MA 02114

/s/ Richard C. Hyman
Richard C. Hyman